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Attorneys for Creditor

The Bloom Firm, a Professional Corporation

UNITED STATES BANKRUPTCY COURT

NORTHERN DIVISION OF CALIFORNIA – OAKLAND DIVISION

In re:

MICHA STAR LIBERTY,

Defendant(s).

Case No.: 24-40401 WJL III

[Chapter 13]

**NOTICE OF NON-OPPOSITION TO
DEBTOR'S MOTION TO DISMISS
CHAPTER 13 CASE**

**TO THE HONORABLE WILLIAM J. LAFFERTY, UNITED STATES
BANKRUPTCY JUDGE, THE OFFICE OF THE UNITED STATES TRUSTEE, THE
CHAPTER 13 TRUSTEE, THE DEBTOR AND PARTIES IN INTEREST AND
THEIR COUNSEL OF RECORD:**

1 **NOTICE IS HEREBY GIVEN** that creditor The Bloom Firm, A Professional
2 Corporation (hereinafter “Bloom”), in the above-entitled bankruptcy case, does not oppose
3 the granting of *Debtor’s Motion to Dismiss Chapter 13 Case* [Dkt. 79] filed by debtor, Micha
4 Star Liberty on 9/16/2024.¹

5
6 Dated: September 17, 2024

Respectfully submitted,

7 **CHORA YOUNG & MANASSERIAN LLP**

8
9 By: /s/ Kevin Ronk

10 Paul P. Young, Esq., CFE

11 Kevin Ronk

12 Attorneys for creditor The Bloom
13 Firm, A Professional Corporation
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27 ¹ On August 1, 2024, Bloom filed a motion to dismiss the Debtor’s bankruptcy case (the “Dismissal
28 Motion”) [Dkt. 67] and a motion for sanctions against the Debtor (the “Sanctions Motion”)[Dkt. 69].
These motions are currently set for hearing on October 10, 2024. The Bloom and Debtor stipulated
to extend the deadline for Debtor to file oppositions to the motions. As of the date of this Notice,
Debtor has not filed oppositions to the motions. Concurrently with this Notice of Non-Opposition,
Bloom is filing notices of withdrawal of Dismissal Motion and the Sanctions Motion.

1 **CERTIFICATE OF SERVICE**

2 I am at least 18 years of age and not a party to the action; my business address is:
3 650 Sierra Madre Villa Ave., Suite 304, Pasadena, CA 91107.

4 On September 17, 2024, I served the interested parties with the document
5 described as follows: **NOTICE OF NON-OPPOSITION TO DEBTOR'S MOTION TO**
6 **DISMISS CHAPTER 13 CASE**

7 1. BY NEF: Service was accomplished through the Notice of Electronic Filing
8 ("NEF") for parties and counsel who are registered ECF Users and identified below:

- 9 • **Jenelle C. Arnold on behalf of Creditor PNC Bank, N.A.:**
10 ecfc anb@aldridgepite.com, jarnold@ecf.inforuptcy.com
11 • **Martha G. Bronitsky:** 13trustee@oak13.com
12 • **Sarah Lampi Little on behalf of Debtor Micha Star Liberty:**
13 sarah@kornfieldlaw.com
14 • **Office of the U.S. Trustee/Oak:** USTPRegion17.OA.ECF@usdoj.gov
15 • **Jennifer C. Wong on behalf of Creditor CitiMortgage, Inc.:**
16 bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com
17 • **Paul Young on behalf of Creditor The Bloom Firm, a Professional**
18 **Corporation:** paul@cym.law, jaclyn@cym.law
19 • **Kevin Ronk on behalf of Creditor The Bloom Firm, a Professional**
20 **Corporation:** Kevin@portilloronk.com, ronk.kc@gmail.com
21 • **Nikko S. Stevens on behalf of Creditor The Bloom Firm, a Professional**
22 **Corporation:** nikko@cym.law
23 • **Cheryl Skigin on behalf of Creditor BMW Bank of North America:**
24 caskigin@earthlink.net

25 I declare under penalty of perjury under the laws of the United States of America
26 that the foregoing is true and correct.

27 Executed on September 17, 2024 at Pasadena, California.

28 /s/ Jaclyn Poon

Jaclyn Poon